



LTV Steel Company, Inc.

CERTIFIED MAIL -RECEIPT REQUEST - 7099 3400 0017 0186 0832

June 8, 2001

Indiana Department of Environmental Management
Office of Enforcement
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

Attn: Jennifer Reno

RECEIVED
JUN 15 2001

MANAGER - WASTE MANAGEMENT
ENVIRONMENTAL CONTROL

Re: LTV Steel Indiana Harbor Works
Violation Letter VL-2001-10394-H and VL-2001-10395-H
Compliance Evaluation Inspection (June 19 – July 24)
EPA I.D. Number: IND 005 462 601

Dear Ms. Reno:

LTV Steel Company Inc. (LTV) received a Violation Letter addressed to both LTV and Oil Technology, Inc. (Oil Tech), on April 24, 2001. This letter is LTV's response to the NOV as it pertains to LTV operations or actions. LTV understands that Oil Tech is responding separately to the NOV as it pertains to its facility.

As you are aware, LTV Steel generates used oil at its Indiana Harbor and Hennepin facilities. The used oil is transported to Oil Tech for reprocessing. Oil Tech is an independent corporate entity and is not associated with LTV except by contract. Oil Tech leases property from LTV, and has located its facility on such leased property. The processed oils are returned to LTV for use as fuel oil.

The response, set out below, presents each allegation followed by LTV Steel's specific response as the "Used Oil Generator".

1. 329 IAC 13-7-5(g)

Used oil processors and re-finers must label all used oil containers and above ground tanks with the words "Used Oil."

A used oil tank located at the Central wastewater treatment Plant was not marked with the words "Used Oil." Additionally, used oil tanks located at the processor site were marked, but were thoroughly covered with oily residue that caused the markings to not be

LTV Response

The used oil collection tank located at LTV's Central Treatment Plant was being re-painted and returned to service during the inspection. The "Used Oil" sign was replaced the day following the agency inspection, June 24, 2000.

The tanks located at the processing facility are the responsibility of Oil Tech.

LTV Response

This regulatory citation applies only to the oil processing facility, therefore, a response only by Oil Tech is appropriate.

However, the Indiana Harbor Works and Hennepin facilities are the used oil generators. They maintain analytical information capable of screening oils sent to Oil Tech. A copy of recent analytical results for used oil generated at Indiana Harbor is provided (see Attachment).

5. 329 IAC 13-7-7

Used oil processor and refiners must keep a record of each used oil shipment accepted for processing or re-refining. Records for each shipment must include the name and address of the transporter who delivers the used oil to the burner, processor, or re-refiner or disposal facility and the EPA identification number of their burner, processor, or refiner or disposal facility who will receive used oil.

Used oil tracking forms for shipments of used oil received from LTV's Hennepin, Illinois facility did not contain the transporter's address, the date of acceptance, and identification number.

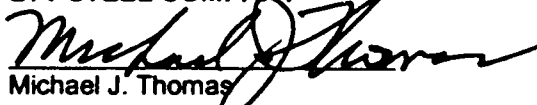
LTV Steel Response

LTV Steel has taken action to ensure that transporters of used oil shipment from LTV's Hennepin facility have a US EPA ID number.

LTV Steel appreciates the extended timeframe for submission of our response. If you should require any additional information, please do not hesitate to contact us.

Very truly yours,

LTV STEEL COMPANY


Michael J. Thomas
Manager, Environmental Services
Indiana Harbor Works

MJT/KAN/AHC:mz
Attachments

bcc: R. J. Morris - w/o attachment
K. A. Nagel - " "
D. E. Papajcik - " "
W. L. West - " "
File

(IDEM-USED Oil NOV)